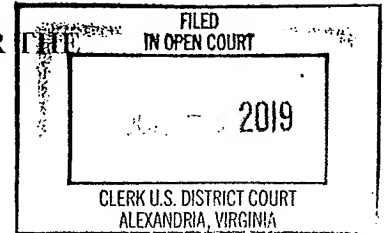


IN THE UNITED STATES DISTRICT COURT FOR
EASTERN DISTRICT OF VIRGINIA

UNDER SEAL

Alexandria Division



UNITED STATES OF AMERICA

v.

GEORGE AREF NADER,

Defendant.

Criminal No. 1:19-CR-201

Count 1: 18 U.S.C. § 2252(a)(1) & (b)(1)
Transportation of Visual Depictions of Minors

Count 2: 18 U.S.C. § 1462
Transportation of Obscenity

Count 3: 18 U.S.C. § 2423(a)
Transportation of a Minor With Intent To
Engage in Criminal Sexual Activity

INDICTMENT

JULY 2019 Term at Alexandria, Virginia

COUNT 1

(Transportation of Visual Depictions of Minors)

THE GRAND JURY CHARGES THAT:

On or about January 17, 2018, within the Eastern District of Virginia and elsewhere, **GEORGE AREF NADER**, attempted to and did knowingly transport and ship, using a means and facility of interstate and foreign commerce, that is, by international commercial airplane, visual depictions, the production of which involved the use of a minor engaging in sexually explicit conduct, which visual depictions were of such conduct, and which visual depictions were stored on an Apple iPhone 7 with serial number F2LSD2XFHFY4.

(All in violation of 18 U.S.C. § 2252(a)(1) and (b)(1))

COUNT 2

(Importation Or Transportation of Obscene Matters)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 17, 2018, in the Eastern District of Virginia, and elsewhere, **GEORGE AREF NADER**, did bring into the United States, or any place subject to the jurisdiction thereof, or knowingly used any express company or other common carrier or interactive computer service, for carriage in interstate or foreign commerce (a) any obscene, lewd, lascivious, or filthy book, pamphlet, picture, motion-picture film, paper, letter, writing, print, or other matter of indecent character or (b) any obscene, lewd, lascivious, or filthy phonograph recording, electrical transcription, or other article or thing capable of producing sound; that is, the importation and transportation by commercial airplane of visual depictions of such matters on an Apple iPhone 7 with serial number F2LSD2XFHFY4.

(All in violation of 18 U.S.C. § 1462)

COUNT 3

(Transportation of a Minor With Intent To Engage in Criminal Sexual Activity)

THE GRAND JURY FURTHER CHARGES THAT:

In or about February 2000, **GEORGE AREF NADER**, knowingly transported a 14-year old boy ("MINOR BOY 1"), who had not attained the age of 18 years, in interstate or foreign commerce, or in any commonwealth, territory or possession of the United States, with the intent that the boy engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempted to do so; to wit, NADER transported MINOR BOY 1 from Europe to Washington-Dulles International Airport, located in the Eastern District of Virginia, by means of commercial airplane, and NADER engaged in a sexual acts with MINOR BOY 1 after NADER transported MINOR BOY 1 from the Eastern District of Virginia to NADER's residence in Washington, D.C.

(All in violation of Title 18, United States Code, Sections 2423(a) (Oct. 30, 1998) & 3283 (1994 & 2003) & D.C. Criminal Code 22-3008 through 22-3009)).

FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE FOR FORFEITURE AS DETAILED BELOW:

Pursuant to Federal Rule of Criminal Procedure 32.2(a), the defendant is hereby notified that, if convicted of any of the violations set forth within Count One, the defendant, GEORGE AREF NADER, shall forfeit to the United States pursuant to 18 U.S.C. § 2253 any and all matters which contain visual depictions of minors engaged in sexually explicit conduct in violation of the charged offense; any property, real or personal, constituting or traceable to gross profits or other proceeds the defendant obtained as a result of the said violations; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations, including, but not limited to, the following: Apple iPhone 7, with serial number F2LSD2XFHFY4.

If any of the property described above, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

(Pursuant to Title 18, United States Code, Section 2253.)

Pursuant to Federal Rule of Criminal Procedure 32.2(a), the defendant is hereby notified that, if convicted of any of the violations set forth within Count Two, the defendant, GEORGE AREF NADER, shall forfeit to the United States pursuant to 18 U.S.C. § 1467 any and all

matters which contain any obscene material produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 1462; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and any property, real or personal, used or intended to be used to commit or promote the commission of such offense, including, but not limited to, the following: Apple iPhone 7, with serial number F2LSD2XFHFY4.

(Pursuant to Title 18, United States Code, Section 1467).

A TRUE BILL:


Foreperson of the Grand Jury

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY



Jay V. Prabhu
Laura Fong
Assistant United States Attorneys